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20 UNITED STATES DISTRICT COURT  
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF  
24 GOVERNMENT EMPLOYEES, AFL-CIO;  
25 AMERICAN FEDERATION OF STATE  
26 COUNTY AND MUNICIPAL EMPLOYEES,  
27 AFL-CIO; et al.,

28 Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**DECLARATION OF JONATHAN B.  
JARVIS**

**DECLARATION OF JONATHAN B. JARVIS**

Jonathan B. Jarvis hereby declares:

1. I am a former Director of the United States National Park Service (“NPS”).

2. I served for 40 years (1976-2016) with the National Park Service as a law enforcement ranger, fire fighter, interpreter, park biologist, superintendent, regional director and then as the 18<sup>th</sup> director of the NPS from my confirmation by the U.S. Senate in 2009 until my retirement in 2017.

3. There are individual national park units in every state of the union and territory, and the park units are often located in rural communities. These communities rely on the visitation to the national parks as a significant contributor to their economies. The contributions to the local and national economy from the national parks is well documented in the book “Valuing U.S. National Parks and Programs America’s Best Investment” by economists Linda Bilmes and John Loomis (Routledge Press, 2020). On average, every dollar invested in the national parks returns \$4 to the local economy and \$10 to the national economy.

4. Based on my 40 years of experience, the mass firing of 1,000 probationary employees of the National Park Service, especially when coupled with the loss of those NPS employees who took the deferred resignation, will have significant and potentially devastating impacts on the sectors described below within over 400 units of the national park system. Moreover, because of the volume of the terminations, the terminations cannot have been based on individual performance evaluations of these employees. NPS provides housing for many employees, so the terminations are likely to result in a loss of housing for some terminated employees. The harm to NPS from mass terminations may be irreparable because qualified individuals will not want to pursue careers at NPS in the future if they risk being subject to such arbitrary treatment.

5. Park Operations: National Parks, especially the large ones such as Yosemite, Yellowstone and the Grand Canyon, operate like entire cities, with the National Park Service providing all the services associated with a municipal government. These include law enforcement, structural and wildland fire fighting, search and rescue, utilities such as potable water and sewer, and trash collection. In addition, the NPS provides visitor information about park nature and history, safety tips, maps and directions to ensure a safe and enjoyable visit for 320 million visitors each year.

1 The firing of over 1000 individuals with probationary status, coupled with those who took the  
2 deferred resignation, will result in a significant impact on many of these services. For instance, a  
3 highly trained and technical position such as a water treatment operator cannot be replaced by an  
4 untrained seasonal employee. Without a certified water treatment plant operator, the NPS cannot  
5 provide potable water to park visitors, residents, or hotels.

6 6. Fee Collection and Passes: Most of the national parks charge an entrance or camping  
7 fee and the process of collecting, accounting, tracking and depositing funds (over \$300 million per  
8 year) is carried out by NPS employees. In addition, these employees sell annual or senior passes and  
9 distribute free passes to active-duty military. The mass firing of over 1000 individuals, coupled with  
10 those who took the deferred resignation, will reduce the staff conducting fee collection, reducing the  
11 overall revenue to the NPS and delay the issuance of passes. The fees collected by the National Park  
12 Service are retained by the agency for improving park visitor facilities.

13 7. Concessions: There are approximately 500 private businesses that operate under  
14 concession contracts within the National Parks that provide visitor services such as food and  
15 beverage, lodging, guide and outfitting, boat and bike rentals, and souvenirs. These businesses gross  
16 over \$1 billion in revenue each year and pay the NPS a franchise fee. The NPS employees provide  
17 food inspection, pest control, and safety inspections as well as emergency medical and fire response  
18 for the concessions to ensure the visitor is well served and safe. The mass firing of over 1000  
19 individuals, coupled with those who took the deferred resignation, will result in a decrease in visitor  
20 safety and a reduction in over-all sales as the park experience declines for visitors.

21 8. Gateway Community Businesses: Gateway communities across the United States from  
22 Estes Park outside Rocky Mountain, to Moab outside Arches and Canyonlands, to Gatlinburg outside  
23 Great Smoky Mountains rely on a steady stream of visitors who spend their travel dollars. Visitors  
24 travel to these parks but rely on the gateway communities for services not provided in the parks.  
25 These private businesses often have a short season to make their annual profits. In return the  
26 communities rely on a well-run, clean and functional national park that is the main attraction. The  
27 mass firing of over 1000 individuals, coupled with those who took the deferred resignation, will  
28 result in the loss of revenue in these gateway communities as visitors report on overflowing toilets,

1 unmaintained trails, closed visitor centers and unsafe conditions in the parks.

2 9. Tourism Companies: Travel and tourism companies, who market our national parks as  
3 domestic and international destinations, rely on parks being well run and safe. Reservations are  
4 booked months and years in advance and result in busloads of visitors arriving at parks. Many tour  
5 companies ask the National Park rangers to board the bus (or boat) and offer interpretation of the park  
6 wildlife and history. The mass firing of over 1000 individuals, coupled with those who took the  
7 deferred resignation, will result in fewer or no rangers to provide that experience, resulting in a  
8 decline in the tour company revenue.

9 10. Guides and Outfitters: Many national park guides and outfitters operate under a  
10 commercial service permit from the NPS to climb, hike, raft, or photograph while in the park. These  
11 private businesses often have a short season to make their annual profits. The mass firing of over  
12 1000 individuals, coupled with those who took the deferred resignation, will slow the process of  
13 issuing the permits for the commercial service, reduce safety inspections and directly impact these  
14 small businesses that rely on the parks being open for operations.

15 11. International Tourism: On an annual basis, national parks host approximately 60  
16 million international visitors. These visitors bring “new” money into the national economy and local  
17 businesses. Many National Park Service rangers are multi-lingual, providing translation services to  
18 the international tourist. The mass firing of over 1000 individuals, coupled with those who took the  
19 deferred resignation offer, will degrade the parks experience for international visitors and potentially  
20 cause a permanent drop off in tourism as they report their experiences to others.

21 12. Public and Private Schools: School trips to national parks are a standard activity for  
22 thousands of public and private schools. Once in the park, the teachers and their students are met by  
23 well-trained park rangers who provide the students with an opportunity to learn and experience the  
24 natural and cultural history of the park. These educational opportunities often complement standard  
25 curriculum and improve overall student interest and performance. The mass firing of over 1000  
26 individuals, coupled with those who took the deferred resignation, will reduce if not eliminate the  
27 park rangers who accompany school trips to the parks.

28 13. Partnerships: Many of the national parks operate in partnership with non-profit

1 entities, states, other federal agencies and local communities. Examples include Redwood National  
2 and State Parks where the NPS works in partnership with California State Parks. Golden Gate  
3 National Recreation Area works in partnership with the Golden Gate Conservancy to provide visitor  
4 services, tours of Alcatraz, restoration projects and souvenir sales. These partnerships rely upon each  
5 other to deliver their component. For instance, at Redwood National and State Parks, the two  
6 agencies jointly operate the visitor centers, helping visitors learn about and experience the park  
7 safely. The mass firing of over 1000 individuals, coupled with those who took the deferred  
8 resignation, will result in the NPS unable to fulfill its half of the partnership. In the case of Golden  
9 Gate NRA, the Conservancy raises private funds to match federal funds.

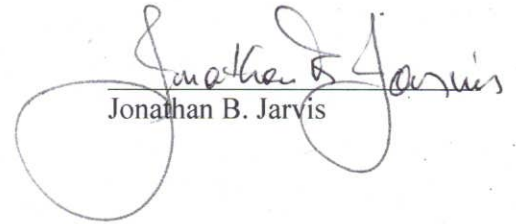
10 14. Volunteers: The NPS enjoys the support of over 200,000 volunteers who give of their  
11 time to support park operations. Volunteers pick up trash, patrol the trails and backcountry, provide  
12 information to visitors and even serve on search and rescue teams. They are supervised by permanent  
13 NPS employees, and their projects are planned and executed under the direction of permanent park  
14 employees. The mass firing of over 1000 individuals, coupled with those who took the deferred  
15 resignation, will result in fewer volunteer coordinators, and a higher safety risk for the volunteers  
16 executing park work.

17 15. Natural Resource Monitoring: National parks are often located at the headwaters of  
18 major rivers and the sources of summer water from melting snowpack. The NPS employees  
19 participate in active monitoring of air and water quality, wildlife species, vegetation, snow pack,  
20 rainfall, and climate on an ongoing and routine basis that provides essential data for scientists and  
21 meteorologists who then advise downstream communities and agricultural businesses on the  
22 predictability of stream flow, flooding, wildfires and water availability. Interrupting this continuous  
23 monitoring impacts the confidence and predictability for both business and communities that are  
24 experiencing climate change impacts. The NPS monitoring provides early warning that saves lives.  
25 The mass firing of over 1000 individuals, coupled with those who took the deferred resignation, will  
26 interfere with this critical work.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
2 and correct. Executed this 21<sup>st</sup> day of February 2025.  
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Jonathan B. Jarvis